

**STATEMENT OF DANIEL N. WENK, DEPUTY DIRECTOR, NATIONAL PARK SERVICE, DEPARTMENT OF THE INTERIOR, BEFORE THE HOUSE SUBCOMMITTEE ON NATIONAL PARKS, FORESTS AND PUBLIC LANDS, COMMITTEE ON NATURAL RESOURCES, CONCERNING H.R. 189, TO ESTABLISH THE PATERSON GREAT FALLS NATIONAL PARK IN THE STATE OF NEW JERSEY.**

**March 29, 2007**

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Mr. Chairman, thank you for the opportunity to appear before your committee to present the views of the Department of the Interior on H.R. 189, a bill to establish the Paterson Great Falls National Park in the State of New Jersey. The Department opposes H.R. 189.

The Department has three main objections to the bill. First, the Special Resource Study authorized by P.L. 107-59 and still under final Departmental review, has preliminarily concluded that the resources of the Great Falls Historic District do not meet congressionally required criteria for designation as a unit of the National Park System. Second, the bill includes within the boundary of the proposed unit, a resource with no relationship to the documented period of historic significance of the Great Falls Historic District or of any determined national significance under established National Historic Landmark criteria. And third, the bill also contains a number of sections that raise crucially important concerns as to how the proposed unit would be effectively and efficiently managed by the National Park Service.

The history of the Great Falls Historic District is rich in the nation's late 18<sup>th</sup> and early 19<sup>th</sup> century movement into the industrial revolution. Conceived by Alexander Hamilton as the demonstration of his *Report on Manufactures* to Congress, the venture was of clear

historic significance. While the Hamilton-inspired Society for the Establishment of Useful Manufactures (S.U.M.) did not achieve the early success envisioned by its architect, largely due to diversion of funds by its initial governor, William Duer, it became a very successful real estate leasing and water power purveyor into the mid 20<sup>th</sup> century. The S.U.M. water power system at the Great Falls, designed by Pierre C. L'Enfant, and constructed between 1794 and 1827, was an engineering achievement of major importance.

Over time, industries at the Great Falls produced cotton and wool textiles, spun flax, hemp, jute, paper, and other products. The site was the location of Samuel Colt's unsuccessful first arms factory, and a major center for locomotive manufacturing and the production of silk fabrics. The latter activity of silk weaving and dyeing, which during its heyday produced half of the nation's silk products, earned Paterson the label of "Silk City." The District was also an important place in labor history, with the unsuccessful Silk Strike of 1913 involving an estimated 24,000 workers spurred on by the labor organization, the Industrial Workers of the World, often referred to as the "Wobblies." John Holland's first submarine, "The Fenian Ram," built in New York, was fitted with its engine at the Great Falls and made its maiden voyage on the Passaic River. While the District was plagued by arson impacting or destroying many of its earliest and most important mills, the remaining structures have integrity and have been and continue to be rehabilitated for housing and other public and private adaptive reuses.

During the course of the Special Resource Study and the public comment period for the report which ended on January 30, 2007, a number of Alexander Hamilton biographers, knowledgeable historians, and interested individuals have urged the designation of the District as a unit of the National Park System because of its seminal role in the industrial revolution and its association with Alexander Hamilton. The Department concurs that the history of the Great Falls Historic District and its remaining resources are of national significance. Its designations as a National Historic Landmark and National Natural Landmark attest to that significance.

National significance, although the first criterion analyzed in any Special Resource Study, does not alone result in a recommendation to Congress for unit designation. The resource being studied must also be judged suitable and feasible for designation, and a determination must be made that there is a need for National Park Service (NPS) management of the resource. The National Park Service does not believe that the Great Falls Historic District meets these critical criteria nor is there a need for NPS management of, or presence at, the site.

Suitability is the determination of whether comparable resources to those being studied are already adequately represented in the National Park System or protected by other public agencies including state and local governments or private organizations. The extant resources of the District primarily comprise the S.U.M. water power system and the remaining elements of a collection of 19<sup>th</sup> century mills used for the manufactures noted above. We believe that within the National Park System and among numerous

other protected sites, there are similar resources adequate to interpret the major theme categories also associated with the Great Falls Historic District, whether they represent comparable manufacturing enterprises, early water power, labor unrest of the same period, or sites associated with Alexander Hamilton's contributions to our nation. In the National Park System, itself, Lowell National Historical Park contains comparable mill resources and tells the stories associated with our nation's industrial revolution, including those of immigrant workers and labor unrest. The John H. Chafee Blackstone River Valley National Heritage Area contains Slater's Mill, the first successful textile manufacturing enterprise in the nation. The Special Resource Study documents many examples of similar resources and themes within and outside of the National Park System. NPS sites associated with Alexander Hamilton include his home, Hamilton Grange, in New York City and, of course, Independence National Historical Park in Philadelphia.

The feasibility analysis conducted by the National Park Service estimates the costs for planning, developing and operating a unit at the Great Falls to range from \$20 to \$34 million dollars over a ten-year period. This estimate assumes a small staffing contingent and no major NPS ownership of resources at the site. In the difficult budget climate facing federal agencies, we believe these costs would negatively impact finite resources available to other units of the National Park System in the Northeast Region and that lesser and equally effective cost alternatives are available through a partnership between the NPS and the State of New Jersey. We believe the costs to implement the provisions of H.R. 189 would far exceed this estimate.

In late 2004 the State of New Jersey established the Great Falls State Park in the Historic District. The boundaries of the park contain the primary resources related to the S.U.M. water power system and the earliest mill sites. The State has recently completed a design competition for phase 1 of the park and has pledged \$10,000,000 for park improvements. The Department believes that the Division of Parks and Forestry of the New Jersey State Department of Environmental Protection, which manages both natural and cultural resources of national significance throughout the State, is fully capable of providing the stewardship necessary to protect the critical resources associated with Alexander Hamilton and the S.U.M. Therefore, we believe there is no need for NPS management of these resources. We understand that many state park systems are encountering necessary budgetary constraints similar to those of the National Park Service. We do not believe this constitutes a reason to supplant any state's management of resources.

The Department also has strong concerns with a number of provisions of H.R. 189 that go beyond the fact that the Great Falls Historic District fails to meet congressionally required criteria for designation. The bill includes Hinchliffe Stadium within the proposed boundary of the unit. Hinchliffe Stadium, built during the 1930s, has important associations with the Negro Baseball Leagues, serving during periods as the home field for the New York Black Yankees. It is also the site where Larry Doby, the second African American to play in the previously all white major leagues, played high school baseball. The site is listed on the National Register of Historic Places, but currently is listed as "locally," rather than "nationally" significant. To be considered as a unit of the National Park System, resources must be determined to meet the criteria for National

Historic Landmark (NHL) designation. This resource is far from being considered for NHL status and no nomination for such a designation has been presented to the Department. Hinchliffe Stadium also has no connection to the NHL determined period of historical significance of the Great Falls Historic District, and we believe it should not be considered for unit designation. Costs associated with maintaining and improving the site would also be significant due to its present deteriorated condition.

H.R. 189 contains other provisions that cause the Department concern. In section 6(d), for example, the bill provides a process for approval of the park's management plan more common to Affiliated Areas of the National Park System or national heritage areas. In section 7, the bill creates a federal commission to coordinate management of the park. In section 8, an advisory council is provided, also appointed by the Secretary, to advise the group created in section 7. In section 10(c), the bill appears to provide for authority to the Secretary to condemn property for Federal ownership under certain circumstances. Congress has been reluctant to extend this authority in recent park legislation.

Section 11(b) provides a matching requirement that for every one federal dollar the value in cash or in-kind of three non-federal dollars must be available. In effect, annual funding to operate the national park unit would be contingent upon the availability of non-federal donations. The Department has concerns with taking on this permanent funding obligation under the assumption that some of the costs would be covered through private fundraising since appropriations would be required if private funds proved to be insufficient. While philanthropic donations can and do help to enhance park activities,

facilities and resources, they should not be relied upon to support core operations, including the salaries for permanent staff.

We have specific concerns about the viability of raising funds for this purpose based on our past experience working in Paterson. While during the study period, advocates for unit designation have stated (as does section 2 (a)(10) of the bill) that significant funding for the park will be available from private donors if the unit is established, attempts to verify any tangible evidence of private funding interests were met with the simple explanation that “They will not identify themselves unless and until the park is created.” In 1996, Congress authorized \$3.3 million through the Omnibus Parks and Public Lands Management Act (section 510) in technical assistance, grants, and infrastructure improvements. All funding required a 50 percent local match, yet over the past 11 years, no local matching funds have been made available under this authority.

H.R. 189 contains other technical and substantive provisions of concern that are incompatible with current unit designation and park management practices.

In conclusion, Mr. Chairman, the Special Resource Study of the Great Falls Historic District does suggest a pathway to an effective partnership with the State of New Jersey to protect and interpret the nationally significant resources of the District. It provides for possible congressional consideration of a Great Falls National Historic Site, as an Affiliated Area of the National Park System, with technical and financial assistance provided by the Secretary of the Interior to the State of New Jersey. We believe that time

spent exploring this alternative could enhance the protection of the District's resources by establishing a strong partnership between the NPS and the New Jersey Department of Environmental Protection, one not dissimilar to the very productive partnership we have enjoyed with the State of New Jersey in its 25 years of management of the congressionally designated 1.1 million acre New Jersey Pinelands National Reserve.

Thank you for the opportunity to present the Department's position on this bill. This concludes my prepared remarks and I would be glad to answer any questions that you or the members of the committee may have.